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**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CF STAFFING SOLUTIONS, LLC, a Nevada  
 limited liability company; MAX CASAL, an  
 individual,

Plaintiffs,

v.

DISTRICT HEALTHCARE SERVICES, LLC,  
 a foreign corporation; BREAKING SILOS IN  
 MEDICINE, LLC, a foreign corporation;  
 HABIB SHAMTE, M.D., an individual; DOES  
 I - X, and ROE CORPORATIONS I – X,  
 inclusive,

Defendants.

CASE NO.: 2:24-cv-02355-GMN-EJY

(District Court of Clark County Nevada  
 Case No. A-24-905033-C)

**STIPULATION AND PROPOSED  
 ORDER TO EXTEND DEADLINE TO  
 RESPOND TO MOTION TO DISMISS  
 FAC [ECF# 9] AND MOTION TO  
 TRANSFER**

**(Second Request for Extension)**

On January 29, 2025, Defendants, District Healthcare Services, LLC (“DHS”); Breaking Silos In Medicine, LLC (“BSIM”), and Habib Shamte, M.D. (“Dr. Shamte”) filed a Motion to Dismiss and Transfer Under 28 U.S.C. § 1404(a) (the “Motion”) [ECF# 12] the First Amended Complaint [ECF# 9] filed by Plaintiffs, CF Staffing Solutions, LLC (“CF Staffing”) and Max Casal (“Casal”). Unfortunately, on January 30, 2025, Counsel Martin L. Welsh’s father passed away (also counsel Larson Welsh’s grandfather). The Parties thereafter stipulated to an extension of the deadline to respond to the Motion to February 26, 2025, which this Court granted [ECF# 14]. Plaintiff’s Counsel’s time away from the office to attend to family responsibilities exceeded what was initially expected by Plaintiff’s Counsel and has caused more delay and disruption than previously anticipated. Thus, Counsel for the Parties have

1 agreed to a second brief extension for Plaintiffs to respond the Motion to Dismiss/Transfer  
2 from February 26, 2025 to March 3, 2025.

3 This is the second stipulation for extension of time to file a response to this motion.

4 Respectfully Submitted,

5 DATED February 20, 2025

6 LAW OFFICE OF HAYES & WELSH

DICKINSON WRIGHT, PLLC

7 /s/ Martin L. Welsh

/s/ Brooks T. Westergard

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13 *Attorneys for Plaintiffs, CF Staffing*

*Attorneys for Defendants, District*

14 *Solutions, LLC and Max Casal*

*Healthcare Services, LLC; Breaking Silos*

*In Medicine, LLC and Habib Shamte,*

*M.D.*

15  
16 IT IS SO ORDERED. DATED:

17 February 21, 2025.

18  
19 

20 GLORIA M. NAVARRO

21 U.S. DISTRICT JUDGE

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